

Exhibit I



U.S. Department of Jus

National Security Division

Counterintelligence and Export Control Section

Washington, D.C. 20530

January 5, 2018

By FedEx

Mr. Mindia Gavasheli
Mr. Peter Martinichev
Ms. Anastasia Sheveleva
RIA Global LLC
1627 K Street, NW
Suite 1000
Washington, DC 20006

Re: Obligation of RIA Global LLC to Register Under the Foreign Agents Registration Act

Dear Messrs. Gavasheli and Martinichev, and Ms. Sheveleva:

Based upon information known to this office, including press reports and other publicly available information¹ as well as non-public information we gathered during our investigation, we have determined that RIA Global LLC ("RIA Global") has an obligation to register under the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. §§ 611-621 (1995) ("FARA" or the "Act"). RIA Global's obligation to register arises from its political activities in the United States on behalf of Rossiya Segodnya International Information Agency, a.k.a. MIA Rossiya Segodnya ("Rossiya Segodnya"), a foreign principal under the Act, and from its related work within the United States as a publicity agent and information-service employee of Rossiya Segodnya.

The purpose of FARA is to inform the American public of the activities of agents working for foreign principals to influence United States Government officials or the American public with reference to the domestic or foreign policies of the United States, or with reference to the political or public interests, policies, or relations of a foreign country or a foreign political party.

As a result of RIA Global's work under the direction and control of Rossiya Segodnya, RIA Global acts as an agent of Rossiya Segodnya in the dissemination of information in the

¹ See, e.g., Office of the Director of National Intelligence, "Assessing Russian Activities and Intentions in Recent US Elections" (2017) ("Intelligence Community Report"), https://www.dni.gov/files/documents/ICA_2017_01.pdf. See also, e.g., Jim Rutenberg, "RT, Sputnik and Russia's New Theory of War," N.Y. Times (Sept. 13, 2017), <https://www.nytimes.com/2017/09/13/magazine/rt-sputnik-and-russias-new-theory-of-war.html>; Russ Read, "How Russia Wages Information Warfare in the United States," Newsweek (Nov. 12, 2016), <http://www.newsweek.com/russia-wages-information-warfare-us-520469>.

United States. As set forth in greater detail below, by virtue of this agency relationship, Rossiya Segodnya's stated purpose,² and RIA Global's actual operation in the United States, RIA Global routinely engages in "political activities" in the United States on behalf of its foreign principal, Rossiya Segodnya. See 22 U.S.C. § 611(1)(i).³ In addition, by virtue of the service that it performs on behalf of Rossiya Segodnya in distributing the Russian government's message in the United States, RIA Global also meets the definition of a "publicity agent" and "information-service employee" under the Act, each of which triggers an additional, independent basis to register. 22 U.S.C. § 611(c)(1)(ii).

Registration under FARA would not affect the content of any broadcasts or publications that emanate from Rossiya Segodnya in Moscow.⁴ Upon registration, Rossiya Segodnya and RIA Global may continue producing and broadcasting the content of their choosing, provided that each broadcast is accompanied by a requisite disclosure statement. See 28 C.F.R. § 5.402(d); see also 22 U.S.C. § 614(b). Registration would simply allow media outlets broadcasting RIA Global programming for Rossiya Segodnya, and Americans who receive such programming, to be fully informed regarding the origin of the content on the network.⁵

² According to reporting by Voice of Russia (now Sputnik), the "new agency is tasked with promoting Russia abroad" and to "secure the national interests of the Russian Federation in the information field." "Margarita Simonyan Appointed Editor-in-Chief of Rossiya Segodnya," The Voice of Russia (December 31, 2013), <https://sputniknews.com/voiceofrussia/news/2013-12-31/Margarita-Simonyan-appointed-editor-in-chief-of-Rossiya-Segodnya-news-agency-8519/>.

³ An "agent of a foreign principal" is defined, in pertinent part, as "any person who acts as an agent . . . or . . . at the order, request, or under the direction or control" of a "foreign principal" and "(i) engages within the United States in political activities for or in the interests of such foreign principal;" or "(ii) acts within the United States as a . . . publicity agent, [or] information-service employee . . . for or in the interests of such foreign principal." 22 U.S.C. § 611(c)(1)(i)-(ii).

⁴ Agents of other foreign media entities have registered under FARA, to include: China's Hai Tian Development U.S.A., which distributes the People's Daily newspaper; China Daily Distribution Corporation, which publishes and distributes the China Daily newspaper; Japan's NHK Cosmomedia America, Inc., which rebroadcasts Japanese language radio and TV programs; and South Korea's KBS America, Inc., which distributes Korean films and rebroadcasts Korean TV news programming. On November 15, 2017, the entity owning the FM frequency over which Sputnik is broadcast in the United States, Reston Translator, LLC, also registered. T&R Productions, LLC, which produces content within the United States for Russia's international television network, RT, and RTTV America, Inc., which previously did so, both recently registered, as well. Registration information for all of these entities is available at <https://www.fara.gov>.

⁵ See, e.g., *Attorney Gen. of United States v. Irish People, Inc.*, 684 F.2d 928, 935 n.23 (1982) ("Resting on the fundamental constitutional principle that our people, adequately informed, may be trusted to distinguish between the true and the false, the bill is intended to label information of foreign origin so that hearers and readers may not be deceived by the belief that the information comes from a disinterested source. Such legislation implements rather than detracts from the prized freedoms guaranteed by the First Amendment.") (quoting *Viereck v. United States*, 318 U.S. 236, 251 (1943) (Black, J., dissenting)).

Relevant Entities

Rossiya Segodnya is a Russian media organization incorporated under the laws of the Russian Federation with a registered office in Moscow.⁶ Russian president Vladimir Putin created Rossiya Segodnya by a decree issued on December 9, 2013, in which he dissolved the state-owned news agency RIA Novosti and replaced it with Rossiya Segodnya.⁷ According to the December 9, 2013, decree, the core business of Rossiya Segodnya is “the coverage of Russian state policy and public life in the Russian Federation.”⁸ As reported by Sputnik, the “new agency is tasked with promoting Russia abroad,” and seeks to “restore a fair attitude to Russia in every country in the world.”⁹

Rossiya Segodnya created the Sputnik brand on November 10, 2014.¹⁰ Sputnik describes itself as a “news agency whose products include newsfeeds, websites, social networks, mobile apps, radio broadcasts and multimedia press centers.”¹¹ Sputnik’s funding comes entirely from Rossiya Segodnya, which itself is funded almost entirely by the budget of the Russian Federation.¹² RIA Global, operating from its offices in Washington, DC, holds itself out as the “United States bureau of Sputnik News” and “a subsidiary of Rossiya Segodnya, which . . . is the publisher of Sputnik News.”¹³

⁶ “Putin Dissolves State News Agency, Tightens Grip on Russia Media,” Reuters (December 9, 2013), <http://www.reuters.com/article/us-russia-media/putin-dissolves-state-news-agency-tightens-grip-on-russia-media-idUSBRE9B80I120131209>.

⁷ *Id.*

⁸ “On certain measures to raise operational effectiveness of state-owned mass media,” Presidential Decree, § 4 (Dec. 9, 2013).

⁹ “Margarita Simonyan Appointed Editor-in-Chief of Rossiya Segodnya,” The Voice of Russia (December 31, 2013), https://sputniknews.com/voiceofrussia/news/2013_12_31/Margarita-Simonyan-appointed-editor-in-chief-of-Rossiya-Segodnya-news-agency-8519/; “It is Necessary to Restore Fair Treatment Towards Russia,” The Voice of Russia (December 9, 2013), https://sputniknews.com/voiceofrussia/news/2013_12_09/It-is-necessary-to-restore-fair-treatment-towards-Russia-Dmitry-Kiselyov-4500/.

¹⁰ “About Us,” Sputnik International, <https://sputniknews.com/docs/about/>. Sputnik is not a registered corporate entity in the U.S. Rather, Sputnik operates in Washington, D.C. through RIA Global. RIA Global is responsible for recruiting employees and hiring “Sputnik” personnel. Press credentials issued to “Sputnik” writers associate those writers with RIA Global.

¹¹ *Id.*

¹² Letter from Nikolay Lakhonin to U.S. Department of State (Jan. 30, 2017); Sputnik Congressional Radio-TV Gallery Membership Application (Feb. 21, 2017).

¹³ See, e.g., Letter from Mindia Gavasheli to Washington Foreign Press Center (Jan. 26, 2017).

Bases for Requiring RIA Global to Register Under FARA

1. Rossiya Segodnya is a Foreign Principal and a Part of the Russian Government

Under FARA, a “foreign principal” includes both “a government of a foreign country” and “a partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign country.” 22 U.S.C. § 611(b). Rossiya Segodnya is incorporated under the laws of the Russian Federation with a registered office in Moscow, Russia. These facts, alone, establish that Rossiya Segodnya is a foreign principal for purposes of FARA. *See* 22 U.S.C. § 611(b)(3).

Rossiya Segodnya also is a foreign principal because it is part of the Russian government.¹⁴ *See* 22 U.S.C. § 611(b)(1). Rossiya Segodnya’s stated mission is to “secure the national interests of the Russian Federation in the information field,”¹⁵ and Rossiya Segodnya’s state-run media services, including RT, Russia’s international television network, and Sputnik, form the backbone of the Russian government’s communications apparatus.¹⁶ Margarita Simonyan serves as the editor-in-chief of both RT and Sputnik,¹⁷ and she has acknowledged that “since RT receives its budget from the state, it must complete tasks given by the state.”¹⁸ Simonyan has also referred to RT as “an information weapon” to be used against the United States.¹⁹ She has explained that RT aims to create a viewer base, and “at the critical moment we will have this audience already built up, an audience that is looking to us for the other side of the truth, and we will certainly take advantage of that.”²⁰ Because Margarita Simonyan serves as the editor-in-

¹⁴ As noted above, Russian president Vladimir Putin created Rossiya Segodnya by decree in 2013. *See* n.6, *supra*.

¹⁵ Charter of MIA Rossiya Segodnya at §2.1 (Dec. 30, 2013), on file with the Federal Agency on Press and Mass Communications of the Russian Federation, available at <http://fapmc.ru/mobile/rospechat/lwr/unitar/item130.html>.

¹⁶ *See* Intelligence Community Report at 3 (assessing that RT serves as the Russian Government’s “principal international propaganda outlet”).

¹⁷ *See* “RT Editor Simonyan to Head Kremlin-Backed News Agency,” BBC (Dec. 13, 2013), <http://www.bbc.com/news/world-europe-25560434>.

¹⁸ Dozhd Online (July 11, 2012), https://tvrain.ru/teleshov/harddaysnight/margarita_simonjan_o_dzhuliane_assanzhe_pussy_riot_i_gosdepe_polnaja_versija-327931/. In a separate 2012 interview, Simonyan noted that Aleksey Gromov, Presidential Administration Deputy Chief of Staff, oversaw RT political coverage, including having in-person meetings with media managers in which he shared classified information and discussed media coverage plans. Annex A to Intelligence Community Report, at 9.

¹⁹ Ilya Azar, “Russia Today Chief Editor Interviewed on Objectivity, Role of Media, Information Warfare,” Lenta.ru (Mar. 7, 2013), <http://lenta.ru/>.

²⁰ *Id.*

chief of both RT and Sputnik, these statements apply with equal force to Sputnik.²¹ Rossiya Segodnya's intent is clear: RT and Sputnik exist to further the interests of the Russian government.

2. RIA Global is Engaged in "Political Activities" on Behalf of Rossiya Segodnya

RIA Global's conduct, on behalf of Rossiya Segodnya and the Russian Federation, constitutes "political activities" for purposes of FARA. 22 U.S.C. § 611(o). Specifically, through its publications and broadcasts, RIA Global seeks to "influence . . . the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States, or with reference to the political or public interests, policies, or relations" of Russia. *Id.* As explained herein, such actions, including the requirement that RIA Global include the official Russian position when addressing certain topics, plainly demonstrate that RIA Global produces content on behalf of Rossiya Segodnya and thereby the Russian government.

In fact, as explained herein, RIA Global serves as the U.S. extension of Rossiya Segodnya's Sputnik operation in Moscow. Among other indicia of its integration into Sputnik Moscow, RIA Global distributes an English-language "Rossiya Segodnya Style Guide" to writers in its Washington, D.C. bureau, which we have obtained. The "Style Guide" states plainly that the "main goal is to inform the international audience about Russia's political, economic and ideological stance on both local and global issues."²² The "Style Guide" explicitly acknowledges that Rossiya Segodnya's mission is to disseminate messaging on behalf of the Russian government: "we must always strive to be objective but we must also stay true to the national interest of the Russian Federation."²³ Correspondingly, RIA Global's hiring process includes a test that enables RIA Global and Rossiya Segodnya to assess the likelihood that a journalist would advance the Russian viewpoint.²⁴

²¹ See n.17, *supra*.

²² See Rossiya Segodnya Style Guide at 3.

²³ *Id.* The Style Guide's requirement to "stay true" to Russian national interest was also noted by former Russia Today London journalist, Sarah Firth, who explained that "rule one of the Russia Today style guide is to blame Ukraine, or anything else, rather than Russia. . . . It's scary that it's genuine RT guidance on how to do a story, and you have to believe it to succeed there." William Turvill, "Russia Today London correspondent resigns in protest at 'disrespect for facts' over Malaysian plane crash," Press Gazette, (July 18, 2014), <http://www.pressgazette.co.uk/russia-today-london-correspondent-resigns-protest-disrespect-facts-over-malaysian-plane-crash/>.

²⁴ One version of the test used in 2017, a copy of which we have obtained, asked applicants to write "3-4 brief news stories" based on a set of ten U.S. news releases. One of the news releases was a White House press release concerning Russia's actions in Ukraine, including the arming of separatists with Russian weapons and the launching of artillery strikes from Russia into Ukraine. In its own reporting of events in Ukraine, Sputnik consistently repeated Russia's official denial that it had any military involvement in Ukraine and Russia's assertion that "allegations" to the contrary were "not supported by factual evidence," notwithstanding direct evidence of Russian military involvement and the fact that Russian president Putin himself had admitted that Russians were present in the conflict and "dealing with tasks . . . in the military sphere." Compare "NATO's Buildup Pushes

Sputnik's newswire and website publications are supervised, directed, and controlled by editors in Moscow. RIA Global's editors work in close coordination and are in regular contact with Sputnik editors in Moscow. For example, on March 17, 2017, RIA Global's writers were directed to cover comments by only President Donald Trump during his meeting with German Chancellor Angela Merkel, because Moscow was handling coverage of Chancellor Merkel.²⁵ Twenty minutes later, an RIA Global editor reversed course based on instruction from Moscow and announced, "the latest – we should cover Merkel as well."²⁶ Likewise, on April 7, 2017, when breaking news was unfolding simultaneously in Sweden and Syria, RIA Global editor Peter Martinichev gave instructions to RIA Global staff that, "Moscow will cover Sweden, we'll focus on Syria."²⁷ Similarly, on May 22, 2017, when an RIA Global writer proposed to write a breaking story about President Trump's visit to Israel, an editor directed him to wait because "Moscow says they are covering."²⁸

Direction from Rossiya Segodnya's operation in Moscow (and, by extension, from the Russian government) impacts the content of articles published by RIA Global. Russian president Vladimir Putin has explained that Russian media funded by the Russian government "cannot help but reflect the Russian Government's official position on the events in our country and in the rest of the world."²⁹ In fact, RIA Global editors and writers are required to include the official "Russia position" on all publications that concern Russia.³⁰ Such instruction has resulted in the inclusion of the Russian government's official position in numerous stories written and edited by RIA Global. For example, Sputnik articles that include discussion of Russian

'Situation at Russian Border Toward Deterioration,'" Sputnik (June 21, 2017) <https://sputniknews.com/military/201706211054834913-nato-russia-shoigu/> with Report on Preliminary Examination Activities 2016, The Office of the Prosecutor, International Criminal Court (Nov. 14, 2016), https://www.icc-cpi.int/iccdocs/otp/161114-otp-rep-PE_ENG.pdf; Simon Shuster, "Putin's Confessions on Crimea Expose Kremlin Media," Time Magazine (Mar. 20, 2015), <http://time.com/3752827/putin-media-kremlin-crimea-ukraine/>; and Roland Oliphant and Rozina Sabur, "Vladimir Putin admits: Russian troops 'were in Ukraine,'" The Telegraph (Dec. 17, 2015), <http://www.telegraph.co.uk/news/worldnews/vladimir-putin/12054164/Vladimir-Putins-annual-press-conference-2015-live.html>.

²⁵ Email from Zlatko Kovach to Andrew Feinberg (Mar. 17, 2017); emails between and among Zlatko Kovach, Olesya Manokhina, Joanne Stocker, Kristopher Rivera, Lyudmila Chernova, John Stanton, Andrew Feinberg, Peter Martinichev, Michael Hughes (Mar. 17, 2017).

²⁶ *Id.*

²⁷ Email from Peter Martinichev to Andrew Feinberg, Zlatko Kovach, Anastacia Sheveleva, Michael Hughes (Apr. 7, 2017).

²⁸ Email from Zlatko Kovach to Andrew Feinberg, Anastacia Sheveleva, Peter Martinichev, Michael Hughes (May 22, 2017).

²⁹ "Putin Visits New HQ of State-Funded External Broadcaster," Kremlin.ru (June 13, 2014), <http://eng.kremlin.ru/>.

³⁰ See, e.g., Email from Zlatko Kovach to Andrew Feinberg, Anastasia Sheveleva, and Peter Martinichev (Feb. 15, 2017).

interference and hacking in the U.S. presidential election of 2016 end with a Russian statement of denial, often with some version of the statement that “[t]he Russian government has refuted US claims it meddled in the US election process, calling them absurd.”³¹

By way of another example, in a story that concerned U.S. sanctions against Russia following Russia’s annexation of Crimea that was published on February 15, 2017, an RIA Global editor added the Russian government position that “Russia has repeatedly denied involvement in the Ukrainian conflict.”³² This addition served to promote the Russian government’s official position, notwithstanding the fact that Russian president Vladimir Putin had previously acknowledged the presence of Russian military intelligence officers who “carried out certain tasks including in the military sphere.”³³ RIA Global writers and editors were also ordered to adjust their content to conform to content restrictions under the Mass Media Law of the Russian Federation. For example, one RIA Global editor, Anastasia Sheveleva, has directed RIA Global staff that when mentioning certain terrorist organizations, RIA Global must always state that such organizations are “banned/outlawed in Russia” due to Russian law.³⁴ As evidenced by the editors’ close coordination with Moscow, such changes were made at the direction of, and on behalf of, Rossiya Segodnya and the Russian government.

This direction, supervision, and control is embedded into the structure of Sputnik’s operation. Sputnik is registered with the Russian Federation under its mass media laws as a single, consolidated entity, and by its own description, operates under the direction and control of a single editorial staff, which functions in multiple languages, including English.³⁵ Sputnik

³¹ “Russian Billionaire Reported to Have Sought Immunity to Testify in US Congress,” Sputnik (May 27, 2017) <https://sputniknews.com/us/201705271054035116-deripaska-sought-immunity-congress/>; see also, e.g., “US Congressman Introduces KREMLIN Act to Study Russia’s Intentions in Europe,” Sputnik (Nov. 16, 2017) <https://sputniknews.com/world/201711161059161043-us-kremlin-act-russia-intention/>; “No Assistance Requests From US on Meddling Probe - Russian Justice Ministry,” Sputnik (May 19, 2017) <https://sputniknews.com/politics/201705191053783752-russia-us-election-meddling-probe/>; “FBI Interviews Employees of Cyber Security Firm Kaspersky Lab,” Sputnik (June 28, 2017) <https://sputniknews.com/us/201706281055055667-us-fbi-kaspersky/>; “RT Editor-in-Chief Mocks Clapper Over Claim of RT’s US Election Meddling,” Sputnik (May 31, 2017) <https://sputniknews.com/russia/201705311054159336-rt-simonyan-clapper-us-election/>.

³² Email from Michael Hughes to Andrew Feinberg (Feb. 9, 2017).

³³ “Putin Admits Russian Military Presence in Ukraine for First Time,” The Guardian (Dec. 17, 2015), <https://www.theguardian.com/world/2015/dec/17/vladimir-putin-admits-russian-military-presence-ukraine>.

³⁴ Email from Anastasia Sheveleva to US-DC.Office@sputniknews.com, Liudmila Chernova, David Burghardt, Tatyana Lukyanova, Oxana Klovovskaya (Feb. 24, 2017).

³⁵ “About Us,” Sputnik International, <https://sputniknews.com/docs/about/>. (“Today, the editorial staff of Sputnik works in more than 30 languages, including English, Spanish, French, German, Arabic, Chinese, etc.”); Federal Service for Supervision in the Sphere of Communications, Information Technologies and Mass Communications License No. LN^oFS77 – 59867, available at <http://rkn.gov.ru/mass-communications/reestr/media/?id=521167>. According to its registration filing, Sputnik’s office in Moscow is responsible for distributing content to “Russia and foreign countries” and broadcasting in well over 30 languages, including English, Spanish, Italian, French, and Swedish.

editors in Moscow control the content of all articles published on the Sputnik website, even after such content is reviewed and approved by editors at RIA Global, and Mr. Gavasheli, as “Editor-in-Chief” of RIA Global, has acknowledged this supervision and control by Moscow over all publications.³⁶ Indeed, RIA Global editors Mr. Martinichev and Ms. Sheveleva at times instruct writers at RIA Global in the United States to bypass editors in the United States and submit stories directly to editors in Moscow.³⁷

As is the case with content produced by RIA Global for the Sputnik newswire and website, all content produced by RIA Global for Sputnik radio broadcasts in the United States is subject to the supervision, direction, and control of editors in Moscow. With the exception of a brief, hourly station identification, every second of every Sputnik radio broadcast heard in the United States emanates from Rossiya Segodnya in Moscow. As required under the services agreement between Reston Translator, LLC (“Reston Translator”) and Rossiya Segodnya, dated June 2, 2017 (the “Services Agreement”), Reston Translator broadcasts “Radio Programs” (*i.e.*, Sputnik) on a 24-hour, 7 days a week basis without interruption.³⁸ Radio Programs are defined in the agreement as “audio communications and materials and/or packages for broadcasting, including promotion and advertising, *produced by [Rossiya Segodnya]*.”³⁹ Reston Translator is prohibited from any alteration of the programming content.⁴⁰ Accordingly, any and all “radio

³⁶ Email from Mindia Gavasheli to Andrew Feinberg (Apr. 7, 2017).

³⁷ See, e.g., Email from Peter Martinichev to US-DC.Office@sputniknews.com, David Burghardt, Tatyana Lukyanova, Oxana Klovskaya (Mar. 22, 2017). By way of another structural example, RIA Global employees are provided with a “@sputniknews.com” email account through a Rossiya Segodnya portal, and all information technology services for RIA Global are performed by individuals at Rossiya Segodnya in Moscow. See, e.g., Email from 6615@rian.ru to Andrew Feinberg (Apr. 14, 2017).

³⁸ Services Agreement at § 1, “Definitions,” and § 2, “Subject of the Agreement.”

³⁹ *Id.* at § 1, “Definitions” (emphasis added).

⁴⁰ *Id.* at § 6(c)(vi) (“The Contract[or] shall broadcast (transmit) the Radio Programs without any cutting, addition, editing, dubbing and other actions that can damage the integrity of the Radio Programs (their parts/fragments). No interruption of the Radio Programs (their parts/fragments) with commercial advertising is allowed.”) In fact, Rossiya Segodnya retains the right to terminate the contract “unilaterally and without recourse to court” in the event of a single alteration of programming content. *Id.* at § 10.4. These and other indicia of direction and control tend to show that RIA Global acts as Rossiya Segodnya’s agent, not merely its contractor. See *Hoffman & Morton Co. v. Am. Ins. Co.*, 181 N.E.2d 821, 823 (Ill. App. Ct. 1962) (“A person may be both an independent contractor and an agent for another. Thus, an attorney at law, a broker, an auctioneer, and other similar persons employed either for a single transaction or for a series of transactions, are agents, although as to their physical activities they are independent contractors.”); Restatement (Third) of Agency § 1.02, cmt. (a) (2006) (“Whether a relationship is one of agency is a legal conclusion made after an assessment of the facts of the relationship and the application of the law of agency to those facts. Although agency is a consensual relationship, how the parties to any given relationship label it is not dispositive.”); 41 Am. Jur. 2d Independent Contractors § 2 (“One who contracts to act on behalf of another and subject to the other’s control except with respect to his or her physical conduct is an agent and also an independent contractor. . . . and agents who are not servants are regarded as independent contractors.”) In fact, in light of the degree of control exercised by Rossiya Segodnya and RIA Global’s economic dependence on Rossiya Segodnya, the relationship between the parties exhibits many elements of a master-servant or employer-employee agency relationship. Cf. 41 Am. Jur. 2d Independent Contractors § 1 (“Generally, an employee is someone who works under the direction of a supervisor, for an extended or indefinite period of time,

programs” created by RIA Global to be broadcast in the United States as Sputnik content are subject to the editorial supervision, control, and policies of Rossiya Segodnya in Moscow.

Rossiya Segodnya’s supervision and control over RIA Global has the effect intended by the Russian government. As explained herein, Sputnik broadcasts reflect the Russian government viewpoint on key political events. For example, and as explained by Sputnik’s former White House correspondent, Andrew Feinberg, editors at Sputnik pressured him to ask the White House press secretaries whether the United States would be exploring alternative theories regarding the April 2017 sarin gas attack in Syria. At the time, it was widely accepted among the world community that the Syrian government was responsible for the attack.⁴¹ The attempt by Feinberg’s editors to generate interest in an alternative theory corresponded to the messaging coming out of the Kremlin at the time, which claimed that the chemical weapons were released when a rebel chemical stockpile was hit during airstrikes.⁴² Similarly, on the day that Turkish soldiers were killed by a Russian airstrike in a friendly fire incident in Syria, and prior to the Russian government’s acceptance of responsibility, Ms. Sheveleva directed all RIA Global writers and editors to provide the “correct background”—that the Turkish soldiers had been killed in a “shootout with Islamic State terrorist group militants.”⁴³ These examples embody the Rossiya Segodnya objective to use Sputnik as an “information weapon” that is deployed at that “critical moment” to promote “the other side of the truth.”⁴⁴

3. *RIA Global Also Serves as a “Publicity Agent” and “Information-Service Employee” for Rossiya Segodnya*

As noted at the outset, FARA requires registration of certain persons who act “within the United States as a . . . publicity agent, [or] information-service employee . . . for or in the interests of such foreign principal.” 22 U.S.C. § 611(c)(1)(ii). A “publicity agent” refers to “any person who engages directly or indirectly in the publication or dissemination of oral, visual, graphic, written, or pictorial information or matter of any kind, including publication by means of . . . broadcasts, motion pictures, or otherwise,” 22 U.S.C. § 611(h), while an “information-

with fairly regular hours, receiving most or all his income from that one employer. Generally, an independent contractor is someone with a special skill (and with the bargaining power to negotiate a rate for the use of that skill), who serves multiple clients, performing discrete tasks for limited periods, while exercising great discretion over the way the work is actually done.”).

⁴¹ See Andrew Feinberg, “My Life at a Russian Propaganda Network,” POLITICO (Aug. 21, 2017), http://www.politico.com/magazine/story/2017/08/21/russian-propaganda-sputnik-reporter-215511?lo=ap_al.

⁴² See, e.g., Tom O’Connor, “Putin, Russian Military Accuse Syrian Rebels of Framing Assad to Draw U.S. Support,” Newsweek (Apr. 11, 2017), <http://www.newsweek.com/russia-military-putin-rebel-chemical-attack-us-support-582621>. This version of the chemical attack also was the subject of RT reporting at the time. “US report on Idlib attack ‘misinterprets evidence,’ ‘politically motivated’ – professor,” RT America YouTube Channel (Apr. 12, 2017), <https://www.youtube.com/watch?v=8BAzQwOepcU>.

⁴³ Email from Anastasia Sheveleva to US-DC.Office@sputniknews.com (Feb. 9, 2017).

⁴⁴ See n.19, *supra*.

service employee” includes “any person who is engaged in furnishing, disseminating, or publishing accounts, descriptions, information, or data with respect to the political, industrial, employment, economic, social, cultural, or other benefits, advantages, facts, or conditions of any country other than the United States or of any government of a foreign country . . .” 22 U.S.C. § 611(i). By developing content for radio and print media within the United States that is later distributed by Rossiya Segodnya as part of Sputnik broadcasts (including distribution within the United States), RIA Global also “engages directly or indirectly in the . . . dissemination of . . . broadcasts,” and therefore serves as a “publicity agent.” 22 U.S.C. § 611(h). Moreover, because its programming concerns “conditions” of a foreign government or “foreign country,” including but not limited to Russia, RIA Global also serves as an “information-service employee” by “furnishing, disseminating, or publishing” those programs. 22 U.S.C. § 611(i).

4. *FARA’s Media Exemption Does Not Apply*

Finally, although you have not raised it, we note that FARA’s exception for “bona fide news or journalistic activities,” see 22 U.S.C. § 611(d), does not apply to RIA Global’s activities. The media exemption only applies if a media outlet “is not owned, directed, supervised, controlled, subsidized, or financed, and none of its policies are determined by any foreign principal[.]” *Id.* As already noted, RIA Global operates under the editorial direction and control of Rossiya Segodnya and according to its policies.

* * *

Please effect RIA Global’s registration within thirty (30) calendar days of the date of this letter. Useful information and forms needed for registration may be found on our website at <http://www.fara.gov>. If you have any questions regarding registration, or have additional information to provide, please contact (b) (6), (b) (7)(C) by telephone at (202) 233-0776 or by e-mail at FARA.public@usdoj.gov.

Sincerely,

b(6)

Heather H. Hunt
Chief, FARA Registration Unit